

OAO91 (Rev. 12/03) Criminal Complaint

## UNITED STATES DISTRICT COURT

Northern DISTRICT OF California

UNITED STATES OF AMERICA

V.

Maurice Bibbs, and  
Deandre Watson.

CRIMINAL COMPLAINT

Case Number:

3:07-70308 EDL

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about March 14, 2007 in San Francisco County, in the Northern District of California defendant(s) did,

(Track Statutory Language of Offense)

with the intent to cause death or serious bodily harm, take a motor vehicle that had been transported, shipped, and received in interstate commerce from the person and presence of another by force and violence and by intimidation,

in violation of Title 18 United States Code, Section(s) 2119.

I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

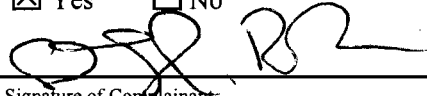
See attached Affidavit of Special Agent Steven D. Robinson.

Approved as to form:

  
William Frentzen, AUSA

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

  
Signature of Complainant

STEVEN D. ROBINSON  
Printed Name of Complainant

Sworn to before me and signed in my presence,

Date

May 25, 2007

at


City

San Francisco CA

State

Name of Judge

Title of Judge

  
Signature of Judge

Nandor J. Vadas  
United States Magistrate Judge

Nandor J. Vadas  
United States Magistrate Judge

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Steven D. Robinson , declare and state the following:

1. I am employed as a Special Agent for the Federal Bureau of Investigation (FBI), and have been so employed since December 2002. I am presently assigned to the San Francisco Office of the FBI, and investigate cases involving violent gangs and drug trafficking activity. During my employment with the FBI, I have participated in several federal search warrants and arrests involving alleged narcotics trafficking and violent acts. I have received training at the FBI Academy in Quantico, Virginia, to include training on Violent Street Gangs, Criminal Case Management, Informant Development, and Title III investigations.
2. I am one of the case agents investigating the criminal activities of members and associates of the Eddy Rock gang, a violent street gang based in the Western Addition area in San Francisco. Based on my personal participation in this investigation, and my analysis of reports made by other law enforcement officers, I am familiar with the facts and circumstances of the overall investigation as well as the facts and circumstance of the crimes which are the subject of this affidavit.
3. This Affidavit is in support of a criminal complaint against MAURICE BIBBS ("BIBBS") and DEANDRE WATSON ("WATSON") for one count of a violation of Title 18 U.S.C. Section 2119 (Carjacking).

**STATEMENT OF PROBABLE CAUSE**

4. On March 14, 2007, at approximately 11:15 p.m., the San Francisco Police Department received a 9-1-1 emergency telephone call regarding the armed theft ("carjacking") of a

- vehicle in the vicinity of 11 Dakota Street, in the Potrero Hill section of San Francisco.
5. San Francisco Police Department (SFPD) Officers/Inspectors responded to the area of 11 Dakota Street and located the victim, hereinafter referred to as "AW". The responding Inspector conducted a recorded interview of AW. During the interview, AW stated that she had pulled up her vehicle, a rented Chrysler Sebring (V-1), to the area of 11 Dakota Street. AW was going to the area to visit a friend. AW exited V-1, but left the engine running, stereo playing, and keys in the ignition.
  6. As AW was walking away from the vehicle, she noted two unknown black males, wearing dark sweatshirts and dark jeans, walking across the street towards her. The black males, later identified at a cold show as BIBBS and WATSON acknowledged AW by nodding their heads at her and smiling, at which time AW noticed that one of the unknown black males, later identified at a cold show as BIBBS, had gold teeth.
  7. After BIBBS and WATSON passed AW, she turned her head and saw them getting into her rental car, BIBBS on the passenger side, WATSON on the driver's side. AW confronted the men about getting into her rental car. BIBBS then pulled a handgun from the pocket of his sweatshirt and pointed it at AW. AW turned to run away and, as she turned, heard a clicking sound she believed was a gun misfiring. AW fell down and injured her knee while fleeing from the scene.
  8. At the time of the carjacking, AW was approximately seven months pregnant. I have reviewed photos taken by SFPD officers at the scene of the carjacking. The photos clearly indicate the scrape on AW's knee as well as clearly showing that she was pregnant.

9. SFPD officers contacted Dollar Rent-A-Car and determined the license plate number of V-1. A lookout was placed throughout San Francisco for the vehicle. At approximately 12:09a.m. on March 15, 2007, less than an hour after V-1 was reported stolen, SFPD Officer Juco saw V-1 traveling eastbound on Golden Gate Avenue at Polk Street. Several SFPD marked units responded to the area and assisted Officer Juco in stopping V-1 at the intersection of 6th Street and Howard Street.
10. When the vehicle was stopped, it had four occupants. BIBBS was driving, WATSON was in the front passenger seat, a minor ("JM") and DION MARTIN ("MARTIN") in the back seat. All four of the occupants were taken out of the vehicle and detained.
11. SFPD Inspector Tim Brophy brought AW to the scene of the vehicle stop and conducted a cold show. AW positively identified BIBBS as the male with the gold teeth who pulled the gun on her and WATSON as the male who drove V-1 from the scene of the carjacking. AW also stated that JM and MARTIN were not involved in the carjacking.
12. A search of V-1 uncovered a Cobra .380 caliber pistol under the front passenger seat. Crime scene investigations found that this pistol had one live round lodged in its firing chamber. This lodged round had to be extracted with a tool. Based upon my training and experience with handguns, this is consistent with a handgun that had misfired and jammed.
13. I have viewed photographs of BIBBS and WATSON taken at the time of their arrest, showing them wearing dark sweatshirts and jeans, as well as showing BIBBS to have gold teeth.

14. I contacted Dollar Rent-A-Car and determined that V-1 had been rented by MICHAEL ULU approximately two weeks before this incident and that AW was listed as an additional driver. I also conducted an interview of ULU who confirmed that he had rented the vehicle for AW and AW's mother to use.
15. During the course of the investigation, I received a telephone call from NATASHA CROSLEY ("CROSLEY"), who is known to me from previous, unrelated contacts. I know CROSLEY to be closely associated with Eddy Rock gang members, including BIBBS and WATSON. The FBI telephone system showed the telephone number that Crosley was calling from to be 415-282-8108.
16. A request was made to the San Francisco Sheriff's Department for recordings of any telephone calls made to 415-282-8108. In response to this request, the San Francisco Sheriff's Department provided two compact discs of recorded telephone calls between inmates at the San Francisco County jail and telephone number 415-282-8108.
17. During a recorded telephone call on March 19, 2007, an inmate identifying himself as "Mo" calls "Tasha" at telephone number 415-282-8108. From voice recognition based on multiple previous contacts, I was able to identify "Tasha" as CROSLEY. Based on later conversations where "Mo" identifies himself to be the person in jail over the carjacking of victim AW, I believe "Mo" to be BIBBS. For clarity, I will refer to "Mo" and "Tasha" as CROSLEY and BIBBS, respectively, in the rest of this affidavit.
18. At the beginning of the call, BIBBS asks CROSLEY to make a three-way telephone call with "Fonya". (BIBBS has a friend named SAFONYA CRAWFORD, who picked up his property the day after his arrest by the San Francisco Police Department related

to this incident. Due to the uniqueness of the name and CRAWFORD's relationship to BIBBS, I believe "Fonya" to be SAFONYA CRAWFORD and will refer to her as "CRAWFORD" in the rest of this affidavit.) CRAWFORD provided BIBBS with the telephone number of the victim, AW. BIBBS then told CROSLEY to make a three-way telephone call to AW. During the conversation with AW, BIBBS identified himself as the person in jail for stealing her car. BIBBS confronted AW and told her that he needed her not to show up for court. AW stated that she did not care that BIBBS and WATSON took the rental car from her. AW stated she only got mad and made a police report because they pulled a gun on her and she is pregnant. BIBBS admitted that he had taken the car and did not deny pulling a gun on AW. BIBBS told AW that he understood that she would be upset over the gun.

19. From other portions of the conversation it appears that BIBBS and AW know individuals in common and were told of each others' identities soon after the carjacking.

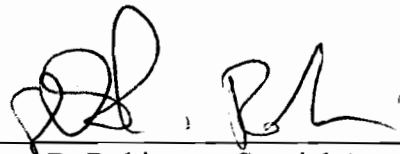
#### **INTERSTATE NEXUS**

20. Based on multiple sources of information found on the Internet, the Chrysler Sebring rental car was manufactured in Sterling Heights, Michigan, outside the state of California. To confirm this information, I spoke with Judy Kenny from Albera Brothers Jeep-Chrysler, located in San Francisco. After providing Kenny with the Vehicle Identification Number ("VIN") of V-1, Kenny told me that the based on particular letters in the VIN, this vehicle was made in Sterling Heights, Michigan. Additionally, the vehicle was originally sold from a dealership in Tulsa, Oklahoma and

shipped to California.

**CONCLUSION**

21. Based upon the foregoing evidence, including physical evidence, witness statements, police officer observations and recorded telephone conversations, there is probable cause to believe that MAURICE BIBBS and DEANDRE WATSON did take a motor vehicle transported in interstate commerce by threat of violence from the person of AW, in violation of Title 18, United States Code, Section 2119 (Carjacking). I therefore respectfully request a warrant be issued for their arrest.



Steven D. Robinson , Special Agent  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED TO BEFORE ME  
THIS 25<sup>th</sup> DAY OF MAY 2007



United States Magistrate

**Nandor J. Vadas**  
**United States Magistrate Judge**